

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

SHEENA WATKINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 24-00545-CV-W-LMC
)	
HIGHER GROUND EDUCATION,)	
INC.,)	
)	
Defendant.)	

AMENDED SCHEDULING AND TRIAL ORDER

A. DISCOVERY SCHEDULE

Pursuant to Rules 16(b) and 26(f), Federal Rules of Civil Procedure, and upon consideration of the parties' proposals in the matter, the prior scheduling order and trial order (Doc. ## 16, 31) are amended with respect to pretrial discovery, the filing of motions, jury trial, and certain additional matters. Deadlines not mentioned below, and which have already passed remain intact.

1. **DISCOVERY** shall close as of **July 3, 2025**.

2. Any **MOTION TO COMPEL DISCOVERY** shall be filed prior to the time specified for the close of discovery, unless a response to a discovery request is not due until after said date, in which case a motion to compel with respect to that discovery request shall be filed within **ten (10)** days immediately after the response is made or is due (whichever is earlier).

Notwithstanding the above, no motion relating to a discovery dispute shall be filed until:

(a) the counsel who believes there is a discovery dispute telephones the opposing counsel to ascertain if there actually is a dispute; (b) counsel determine that they cannot resolve the dispute; and (c) counsel telephone the undersigned's office (816-512-5775) to request a

telephone conference. Any discovery motion filed without complying with this procedure will be denied.

3. **DISPOSITIVE MOTIONS**

- a. All **DISPOSITIVE MOTIONS** shall be filed on or before **August 18, 2025**.
- b. **OPPOSITION** to any dispositive motions shall be filed within 21 days after the dispositive motion is filed.
- c. **SUGGESTIONS IN REPLY** shall be filed within 14 after the opposing suggestions are filed.

B. TRIAL ORDER

The above-styled cause is hereby set for a pretrial conference on **February 2, 2026**, at **11:00 a.m.** A jury trial shall commence at **9:00 a.m.** on **February 10, 2026**, in **Kansas City, Missouri**.

- 4. On or before **January 12, 2026**, the parties will file:
 - a. **A LIST OF ALL WITNESSES** who may be called at trial by that party; and
 - b. **A LIST OF ALL EXHIBITS** which may be offered at trial by that party. Each exhibit so listed shall be pre-marked and numbered. If only a portion of an exhibit is to be offered, the portion to be offered shall be specifically identified.
 - c. **PROPOSED VOIR DIRE QUESTIONS**: all proposed voir dire questions.
 - d. **JURY INSTRUCTIONS** (with sources).
- 5. **DEPOSITION OR PRIOR TRIAL TESTIMONY**
 - a. On or before **January 16, 2026**, each party should file a **DESIGNATION**, by page and line number, of any deposition or prior trial testimony to be offered in evidence as a part of that party's case-in-chief; and

b. On or before **January 29, 2026**, each party shall serve and file any **OBJECTIONS** to proposed deposition or prior trial testimony designated by any other party; and a **DESIGNATION**, by page and line number, of any deposition or prior trial testimony to be offered as cross-examination to deposition testimony designated by other parties.

PLEASE NOTE: The parties must provide copies of the deposition transcript with their designations or make arrangements with the courtroom deputy to timely file the transcript.

6. **MOTIONS IN LIMINE**

a. On or before **January 16, 2026**, all parties shall serve and file all motions in limine, with supporting suggestions.

b. On or before **January 29, 2026**, all parties shall serve and file any desired responses to motions in limine.

7. **PLEASE NOTE:** A witness not listed in accordance with this Order will not be permitted to testify, except for good cause shown and with leave of Court; and that an exhibit not listed or deposition or prior trial testimony not designated in accordance with this Order will not be received in evidence, except for good cause shown and with leave of court.

IT IS SO ORDERED.

/s/ Lajuana M. Counts

LAJUANA M. COUNTS

UNITED STATES MAGISTRATE JUDGE